

Exhibit C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANTHONY BELFIORE, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

PROCTER & GAMBLE COMPANY,

Defendant.

Case No. 14-04090-JBW

Supplemental Declaration

of

COLIN B. WEIR

July 9, 2019

REFERENCES MATERIALS DESIGNATED "CONFIDENTIAL" AND "HIGHLY
CONFIDENTIAL ATTORNEYS' EYES ONLY" UNDER PROTECTIVE ORDER

Supplemental Declaration of Colin B. Weir
July 9, 2019
Page 11 of 20

the model. It is a statistic one might examine to see whether you are getting appropriate results and whether the model makes statistical sense.

42. The T-statistic is yet another objective measure of the reliability of the results of a statistical model. Each explanatory variable will produce a result from the model—a "coefficient"—along with a T-statistic to evaluate whether the result is statistically significant. It gives the economist guidance that the coefficient is meaningful in a statistical sense.

The available data

43. The data necessary to conduct a hedonic regression analysis and damage calculation in this litigation are available, or will become available. Such data comes from one of several sources: Defendant's own business records (e.g., pricing data, product attributes, sales volumes)²⁹; industry resources and independent market research (e.g., pricing and product attribute information from IRI/Nielsen).

44. At my direction, Counsel for Plaintiff has obtained sales data from IRI.³⁰ This data set contains weekly sales data of flushable wipes, other wipes, and toilet tissue from February 2010 through May 2019 for the state of New York. The data contains information, by product/UPC, the Dollar and Unit Sales (both on a promotional and non-promotional basis), as well as brand, pack size, and other product information.

45. Defendant regularly uses and relies upon third party market research data of this kind,³¹ and has a full time representative from such a firm co-located at P&G.³²

²⁹ See, generally, discussion of sales volumes and product attributes above.

³⁰ See e.g., Belfiore_PG_IRI0001.

³¹ Richards Deposition, at 22, 27, 59.

³² *Id.*, at 31-32.